

make clear that it is the content that is provided to the user that is modified based on session dependent information, such as a user identification or the like. Applicants submit that such amendments do not narrow the scope of the claims as originally filed and are not made for patentability purposes but are provided merely to make explicit the meaning of content modification as that term is used in the present application.

The Claims Are Patentable Over Shwed

Claims 7, 8-13, 16, 21-27, 30, 35-41, and 43-45 stand rejected as anticipated by United States Patent No. 5,835,726 to Shwed *et al.* (hereinafter "Shwed"). Of the pending claims, Claims 9, 23 and 37 are independent claims. As described in detail in the present specification, embodiments of the present invention provide for modifying content provided to a user of a device based on session dependent information. As an example, Claim 9 recites:

9. (Amended) A method of controlling content provided to a device of a user of a network, the method comprising:
providing session dependent information associated with the device to a network device having stored policies which are based on the session dependent information; and
automatically modifying the content provided by the network device to the device based on the policies and the provided session dependent information so as to modify the content provided to the user of the device.

Similar recitations are found in Claims 23 and 37. Thus, it is not merely the format of a packet that may be modified based on the session dependent information but the actual content provided to a user. For example, images may be removed from the content provided to the user if the session dependent information indicates that the user is communicating over a low speed communication link.

In contrast to the content modification of the present invention, Shwed describes formatting of packets, for example, to encrypt, decrypt or digitally sign the data packets, irrespective of the actual content provided by the data packets. *See* Shwed, Abstract. Shwed does not alter the content provided to a user based on session dependent information but at most modifies the format of data packets provided to a user's device. The Official Action cites to Shwed, col. 13, lines 6-19, which describes packet modification, but the cited portion of Shwed does not describe modifying the content which is provided to a user. Furthermore, since Shwed only

relates to firewalls using, for example, address translation or encryption, there would be no reason to modify Shwed to modify the content provided to a user as recited in the independent claims. Accordingly, Applicants submit that the independent Claims 9, 23 and 37 are not anticipated by Shwed and request withdrawal of the present rejection. Applicants further submit that the remaining claims are patentable at least per the patentability of their base claims.

Claims Depending from Claims 9, 23 and 37 are Separately Patentable

While each of the claims which depend from Claims 9, 23 and 37 are patentable as depending from a patentable base claims, certain of the dependent claims are separately patentable over Shwed. For example, Claims 10, 24 and 38, each recite that the modification of the content comprises **"automatically translating content of a communication provided to the device associated with the user from a first language to a second language."** The Official Action completely ignores the recitations of the claims that the translation is from one language to another and merely states that Shwed teaches "automatically translating content of a communication provided to the device." There is no discussion in Shwed at all about translating from a first language to a second language. As discussed above, Shwed relates to firewalls. Thus, Shwed would have no reason to perform language translation on the content of data provided to a user. Accordingly, Applicants submit that Claims 10, 24 and 38 are separately patentable for at least these additional reasons. However, should the Examiner maintain this rejection, Applicants request that the Examiner explain how the cited portion of Shwed teaches the recitations of these claims.

Claims 11, 25 and 39 depend from Claims 10, 24 and 38 and, therefore, are separately patentable for the reasons discussed above. However, these claims also recite that the session dependent information from which the determination of whether to modify the content to translate from one language to another is "at least one of a type of network connection, a type of device connected to the network, a user identification of the user and an identification of an application executed by the user." Shwed does not disclose or suggest basing such a language translation on any of the network connection, the type of device, a user identification or an identification

of an application. As such, Applicants submit that Claim 11, 25 and 39 are separately patentable for at least these additional reasons.

Claims 7, 21 and 35 further recite that the policies for modification of content are stored on a second network accessible device and are obtained in response to the network device being provided the session dependent information. In contrast, the cited portion of Shwed does not describe policies that are stored on a second network device and used by a first network device or that the policies are obtained from the second network device **in response to the network device being provided the session dependent information**. See Shwed, col. 3, lines 8-35 and col. 14, line 40 to col. 15, line 42. In fact, Shwed expressly recites that "each firewall maintains a rule base that instructs the firewall how to handle both inbound and outbound communications between network objects." Shwed, col. 14, lines 62-65. Thus, Shwed expressly states that the rules are stored locally, not on a second network accessible device as recited in Claims 7, 21 and 35. Furthermore, because the rules are stored locally, there would be no reason to obtain them responsive to receiving the session dependent information. Accordingly, Applicants submit that Claims 7, 21 and 35 are separately patentable for at least these additional reasons.

Claims 8, 22 and 36 each recite that the second network accessible device is an on-demand server. No such disclosure is found in Shwed and the Official Action does not even address the recitations of these claims. Accordingly, Applicants submit that Claims 8, 22 and 36 are separately patentable for at least these additional reasons.

Claims 12, 26 and 40 each recite that "the policies comprise policies which control at least one of characteristics of a network connection, characteristics of content associated with a device utilized by the user, and preferences associated with an application utilized by a user." Shwed does not suggest using policies for the control of the items identified in these claims. Accordingly, Applicants submit that Claims 12, 26 and 40 are separately patentable for at least these additional reasons.

Claims 43 through 45 each recite that the content controlled is at least one of "removing color components of the content, removing graphics information to provide text-only content, prioritizing communications and varying preferences for an application." Applicants submit that such modification of content is neither disclosed nor suggested by the cited references. In particular, the cited portion of Shwed says

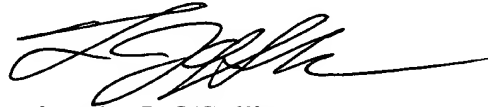
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nothing about any of the recitations of Claims 43 through 45, but only addresses firewall issues. There is no discussion of color components, graphics, communication prioritization or application preferences. Accordingly, Applicants submit that Claims 43 through 45 are separately patentable over the cited references for at least these additional reasons. However, should the Examiner maintain this rejection, Applicants request that the Examiner explain how the cited portion of Shwed teaches the recitations of these claims.

Conclusion

Having addressed each of the issues raised in the Official Action, Applicants submit that the present application is in condition for allowance, which action is respectfully requested.

Respectfully Submitted,



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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Box NON-FEE Amendment, Commissioner for Patents, Washington, DC 20231, on July 10, 2001.



Traci A. Brown
Date of Signature: July 10, 2001

Version of Claims with Changes Shown

In the Claims:

Please amend Claim 9 to recite as follows:

9. (Amended) A method of controlling content provided to a device of a user of a network, the method comprising:

providing session dependent information associated with the device to a network device having stored policies which are based on the session dependent information; and

automatically modifying the content provided by the network device to the device based on the policies and the provided session dependent information so as to modify the content provided to the user of the device.

Please amend Claim 23 to recite as follows:

23. (Amended) A system for controlling content provided to a device of a user of a network, comprising:

means for providing session dependent information associated with the device to a network device having stored policies which are based on the session dependent information; and

means for automatically modifying the content provided by the network device to the device based on the policies and the provided session dependent information so as to modify the content provided to the user of the device.

Please amend Claim 37 to recite as follows:

37. (Twice Amended) A computer program product for controlling content provided to a device of a user of a network, comprising:

a computer readable storage medium having computer readable program code means embodied in said medium, said computer readable program code means comprising:

computer readable program code means for providing session dependent information associated with the device to a network device having stored policies which are based on the session dependent information; and

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computer readable program code means for automatically modifying the content provided by the network device to the device based on the policies and the provided session dependent information so as to modify the content provided to the user of the device.